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February 11, 2022

Hon. William R. Kuntz, II
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: GHABRA v. PALISADES COLLECTION, LLC, FBCS, INC., and SYNERGETIC COMMUNICATION, INC.
Docket No. 21-CV-03599

Dear Judge Kuntz:

As you know, this office represents Synergetic Communication, Inc. This office previously filed a pre-motion conference letter and the Court previously set a briefing schedule, which was amended at plaintiff's request.

The purpose of this correspondence is to request one further extension of the briefing schedule for Synergetic's anticipated motion to dismiss pursuant to FRCP 12(b)(2).

The plaintiff and the Synergetic defendant have agreed to the following modified briefing schedule:

1) The deadline to file the Motion To Dismiss is to be extended from February 14, 2022 to February 28, 2022.

2) The deadline to file the Opposition To The Motion To Dismiss is extended from March 18, 2022 to April 22, 2022 as plaintiff's counsel, Emma Caterine, will be unavailable during the month of March.

3) The deadline to file the Reply In Support Of The Motion To Dismiss will be extended from April 11, 2022 to May 5, 2022.

This is the second request for an extension of the deadlines but is the first request made by the Synergetic defendant. This request is made with plaintiff's consent.

Thank you for your consideration.

Sincerely,

BARRON & NEWBURGER, P.C.

By: Arthur Sanders
as/bmm

SO ORDERED.

s/ WFK

HON. WILLIAM F. KUNTZ, II
UNITED STATES DISTRICT JUDGE

Dated: February 11, 2022

Brooklyn, New York